

REMARKS

The Examiner is thanked for the performance of a thorough search.

No claims have been amended, added, or cancelled. Hence, Claims 1-24 are pending in the application.

I. SUMMARY OF THE REJECTIONS/OBJECTIONS

Claims 1-4 and 13-16 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent Number 5,878,415 by Olds (“*Olds*”) in view of “Database Systems: Principles, Design, & Implementation” by Ricardo (“*Ricardo*”).

Claims 5, 7-9, 17, and 19-21 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Olds* and *Ricardo* in view of U.S. Patent Number 5,684,990 by Boothby (“*Boothby*”).

Claims 6 and 18 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Olds*, *Boothby*, and *Ricardo* in view of information officially noticed to be well known, allegedly (“the Official Notice”).

Claims 10-12 and 22-24 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Olds*, *Boothby*, and *Ricardo* in view of U.S. Patent Number 5,802,518 by Karaev et al. (“*Karaev*”).

The rejections are respectfully traversed. Applicants specifically challenge the assertion of the Official Notice that “setting an order of operations such that moving is between the insert and delete operations” is well known, on the basis that the Office Action fails to provide adequate reasoning for this assertion.

II. RESPONSE TO REJECTIONS BASED ON THE ALLEGED PRIOR ART

A. Claims 1-4 and 13-16

Claims 1 and 13 feature the following limitations:

storing hierarchy data that identifies
a set of nodes that correspond to ORG-UNITS associated with the
organization; and
hierarchical relationships between said nodes that reflect
hierarchical relationships between the ORG-UNITS that
correspond to said nodes;
establishing a first mapping between the users and the set of nodes based
on the ORG-UNITS to which the users belong;
establishing a second mapping between the documents in said set of
documents and the set of nodes; and
**determining which documents in said set of documents a user is
allowed to access based on the hierarchy data, the first
mapping and the second mapping.**

Neither *Olds* nor *Ricardo* teaches or suggests the limitation, “determining which documents in said set of documents a user is allowed to access based on the hierarchy data, the first mapping and the second mapping.” Based on the earlier limitations of Claims 1 and 13, the “hierarchy data” in this limitation must identify (a) nodes that correspond to ORG-UNITS and (b) hierarchical relationships between the nodes. The Office Action admits that *Olds* fails to teach or disclose hierarchy data that identifies such things. The Office Action alleges that *Ricardo* discloses hierarchy data that identifies such things. However, *Ricardo* fails to teach or suggest anything about such hierarchy data being a basis of determining which documents a user is allowed to access.

Because neither *Olds* nor *Ricardo* individually teaches or suggests the limitation, “determining which documents in said set of documents a user is allowed to access based on the hierarchy data, the first mapping and the second mapping,” it follows that even the combination of *Olds* and *Ricardo* does not teach or suggest this limitation. Even if, as the Office Action alleges, *Olds* discloses controlling object access based on access control

lists associated with **objects** in a hierarchy of **objects** (the alleged documents), the access control techniques disclosed by *Olds* are not in any way based on hierarchy data that identifies hierarchical relationships between **ORG-UNITS** of an organization.

Hierarchical relationships between **objects** have nothing to do with hierarchical relationships between **ORG-UNITS** of an organization. Controlling access to objects based on hierarchical relationships between **objects** is not the same as controlling access to objects based on hierarchical relationships between **ORG-UNITS** of an organization.

The mere existence of a hierarchy of **ORG-UNITS**, which the Office Action alleges to be disclosed by *Ricardo*, would not have provided a sufficient motivation to one of ordinary skill in the art at the time of the invention to replace the object hierarchy disclosed in *Olds* with the hierarchy of the kind disclosed in *Ricardo* while adapting the access control techniques alleged to be disclosed in *Olds* to somehow work with the hierarchy of the kind disclosed in *Ricardo*. The hierarchies allegedly disclosed by *Olds* and *Ricardo* are completely different. The hierarchies allegedly disclosed by *Olds* and *Ricardo* cannot be mixed and matched based solely on the rationale that they are both hierarchies.

For at least the above reasons, it is respectfully submitted that Claims 1 and 13 are patentable over the cited art, and are in condition for allowance.

Claims 2-4 and 14-16 are dependent claims, each of which depends (directly or indirectly) on either Claim 1 or Claim 13. Each of Claims 2-4 and 14-16 is therefore allowable for the reasons given above with respect to Claims 1 and 13. In addition, each of Claims 2-4 and 14-16 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to

expedite the positive resolution of this case, a separate discussion of those limitations is not included at this time.

B. Claims 5-12 and 17-24

Claims 5-12 depend from Claim 1. Claims 17-24 depend from Claim 13. As discussed above, Claims 1 and 13 require “determining which documents in said set of documents a user is allowed to access based on the hierarchy data, the first mapping and the second mapping.” By virtue of their dependence from Claims 1 or 13, Claims 5-12 and 17-24 also include this limitation.

As discussed above, *Olds* and *Ricardo*, taken individually or in combination, do not in any way teach or suggest this limitation. Thus, Claims 5-12 and 17-24 are patentable over *Olds* and *Ricardo*, taken individually or in combination.

Boothby and *Karaev* also fail to teach or suggest this limitation. In fact, the Office Action does not even allege that *Boothby* or *Karaev* discloses or suggests this limitation. Thus, Claims 5-12 and 17-24 are patentable over *Boothby* and *Karaev*, taken individually.

Even combined (assuming *arguendo* that it would have been obvious to combine the references), *Olds*, *Ricardo*, *Boothby*, and *Karaev* fail to disclose or suggest all of the limitations of Claims 5-12 and 17-24. As discussed above, none of these references discloses or suggests “determining which documents in said set of documents a user is allowed to access based on the hierarchy data, the first mapping and the second mapping.” Thus, even if the references were combined, they would still fail to disclose or suggest this aspect of Claims 5-12 and 17-24. For at least this reason, Applicants submit that Claims 5-12 and 17-24 are patentable over *Olds*, *Ricardo*, *Boothby*, and *Karaev*, taken individually or in combination.

III. CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP



Christian A. Nicholes
Reg. No. 50,266

1600 Willow Street
San Jose, CA 95125
(408) 414-1080, ext. 207
Date: July 14, 2004
Facsimile: (408) 414-1076

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